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December 15, 2015

The Hon. Stuart M. Bernstein  
United States Bankruptcy Judge  
United States Bankruptcy Court for the  
Southern District of New York  
One Bowling Green  
New York, New York 10004-1408

**Re: SIPA Liquidation of Bernard L. Madoff Securities LLC - No. 08-01789-SMB**

Dear Honorable:

We write to the court as counsel for Irving H. Picard, the Trustee in the SIPA liquidation of Bernard L. Madoff Securities LLC, with the input and consent of the defendants' coordinating counsel in the proceedings on the defendants' consolidated motion to dismiss on extraterritoriality grounds. Due to the numerous cases and defendants involved in the extraterritoriality motion to dismiss, we write to inform the court that the defendants listed below are no longer part of the extraterritoriality proceeding due to settlements, pending settlements or dismissals:

Case Number	Case Caption	Previously Moving Defendant(s) No Longer Participating	Reason for Non-Participation
09-1239-SMB 12-cv-2638-JSR	<i>Picard v. Fairfield Investment Fund Ltd., Stable Fund, Fairfield Greenwich Ltd., Fairfield Greenwich(Bermuda) Ltd., Fairfield Greenwich Advisors LLC, Fairfield International Managers Inc., Walter Noel, Jeffrey Tucker,</i>	Fairfield Investors (Euro) Ltd	Dismissed

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	<i>Andres Piedrahita, Mark McKeefry, Daniel Lipton, Amit Vijayvergiya, Gordon McKenzie, Richard Landsberger, Philip Toub, Charles Murphy, Robert Blum, Andrew Smith, Harold Greisman, Gregory Bowes, Corina Noel Piedrahita, Lourdes Barreneche, Cornelis Boele, Santiago Reyes, Jacqueline Harary</i>		
10-4284-SMB 12-cv-2646-JSR	<i>Picard v. Plaza Investments International Ltd. and Notz Stucki Management (Bermuda) Ltd.</i>	All Defendants	Settled and Dismissed
10-5229-SMB 12-cv-2800-JSR	<i>Picard v. Defender Ltd., Reliance Management (BVI) Ltd, Reliance Management (Gibraltar) Ltd., Reliance International Research LLC, and Tim Brockman</i>	All Defendants	Settled and Dismissed
10-5267-SMB 12-cv-2928-JSR	<i>Picard v. Leon Flax, Turret Corporation (f/k/a Woodstock Corporation, f/k/a Lehigh Corporation) Eastside Investment Ltd., The Tower Trust, Investec Trust</i>	All Defendants	Case Dismissed

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	<i>(Switzerland) S.A. (as Trustee of The Tower Trust), Radcliffes Trustee Company (as Trustee of the Tower Trust), R&amp;H Trust Co (Jersey) Ltd. (as Trustee of The Tower Trust), and Wellington Trustee (BVI) Ltd. (as Trustee of The Tower Trust)</i>		
11-1724-SMB 12-cv-3402-JSR	<i>Picard v. Pictet et Cie</i>	All Defendants	Current Mediation
11-1725-SMB 12-cv-2587-JSR	<i>Picard v. Banque J. Safra (Suisse) SA</i>	All Defendants	Current Mediation
12-1513-SMB 12-cv-7228-JSR	<i>Picard v. Citivic Nominees Ltd.</i>	All Defendants	Response Extended Due To Possible Substitution of Defendant
12-1691-SMB 12-cv-8709-JSR	<i>Picard v. Banque Degroof SA/NV (a/k/a Banque Degroof Bruxelles a/k/a Bank Degroof SA/NV), Banque Degroof Luxembourg S.A., Banque Degroof France S.A. (f/k/a Banque Degroof Et Phillipe S.A.), Degroof Gestion Institutionnelle Luxembourg S.A., Elite-Stability Fund SICAV and Elite-Stability Fund SICAV Stablerock</i>	All Defendants	Case Dismissed

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	<i>Compartment (as represented by their Liquidator Pierre Delandmeter), Pierre Delanmeter (in his capacity as Liquidator of Elite-Stability Fund SICAV and Elite-Stability Fund SICAV Stablerock Compartment), Access International Advisors LLC, Access Management Luxembourg S.A. (f/k/a Access International Advisors (Luxembourg) S.A., and as represented by its Liquidator Fernand Entringer), Fernand Entringer (in his capacity as Liquidator of Access Management Luxembourg S.A. (f/k/a Access International Advisors (Luxembourg) S.A.), Aforge Finance Holding, Aforge Finance, Aforge Capital Management S.A., Aforge Gestion</i>		
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Thank you for your attention to the foregoing.

Respectfully,

/s/ Thomas L. Long

Thomas L. Long

cc: Robinson Lacey